

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Amy Taft	:	
4885 Winchester Pike	:	
Columbus, Ohio 43232	:	
Plaintiff,	:	Case No.:
	:	
vs	:	Judge
	:	
Selective Insurance Company of America	:	Magistrate Judge
40 Wantage Avenue	:	
Branchville, New Jersey 07890	:	Jury Demand Endorsed Hereon
	:	
Defendant.	:	

**COMPLAINT**

**Introduction**

1. This is a claim brought for breach of an insurance policy covering flood damage to Plaintiff's home.

**Parties**

2. Plaintiff, at all relevant times was a resident in the Southern District of Ohio, Eastern Division.
3. Defendant at all relevant times was a corporation licensed to sell in insurance in the State of Ohio and doing business in the Southern District of Ohio, Eastern Division.

**Jurisdiction and Venue**

4. Jurisdiction and venue are proper pursuant to 42 U.S.C. §4072 and 42 C.F.R. §62.22 since the property that is the subject of this action and was covered by the flood insurance policy is located in the Southern District of Ohio, Eastern Division.

Facts

5. Prior to Plaintiff purchasing her home at 4885 Winchester Pike, City of Columbus, Franklin county, Ohio, she was required by her lender to purchase an insurance policy covering damages as a result of flooding.
6. Plaintiff purchased from Defendant a policy of insurance in September, 2016 to cover damages to her home as a result of flooding and which policy was in full force and effect at all relevant times herein. A copy of that policy is attached as Exhibit A.
7. On or about July 13, 2017, Plaintiff experienced damages to her home as a result of flooding.
8. On or about July 13, 2017, Plaintiff made a claim to Defendant pursuant to her insurance policy, Exhibit A.
9. Defendant has paid part of Plaintiff's claim and denied the remainder of said claim.
10. Defendant's denial of part of Plaintiff's claim is a breach of the contract of insurance, a copy of which is attached as Exhibit A.
11. Plaintiff has performed all conditions precedent on her part, including, but not limited to, filing a timely and proper proof of claim.
12. Plaintiff has suffered damages as a result of Defendant's breach of the insurance policy.

Wherefore Plaintiff prays that she be granted a judgment in an amount equal to the damages she has suffered as a result of Defendant's breach, plus costs and attorney fees.

Respectfully Submitted,

/s/ Steve J. Edwards  
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**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues.

/s/ Steve J. Edwards  
Steve J. Edwards